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10 Attorneys for Plaintiff
11 United States of America

12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 **United States of America,**
15 Plaintiff,
16 v.
17 **Charles Wurm,**
18 Defendant.

Case No. 2:16-cr-00070-GMN-VCF

**Motion to Dismiss Indictment
Against Defendant**

19 The United States moves for the Court to dismiss the Indictment against
20 defendant Charles Wurm because defendant successfully complied with the terms a
21 Pretrial Diversion Agreement.

22 On March 9, 2016, defendant was charged in the District of Nevada with
23 conspiracy to commit wire fraud and wire fraud, in violation of Title 18, United
24 States Code, Sections 1349 and 1343, respectively. ECF No. 1. On October 13, 2017,
25 defendant entered a Pretrial Diversion Agreement with the United States

1 Attorney's Office requiring him to pay restitution and be supervised by Pretrial
2 Services for a period of twelve months, among other terms. ECF No. 41.

3 Recently the Pretrial Services Office informed the United States Attorney's
4 Office that defendant has fully complied with terms of the Pretrial Diversion
5 Agreement, including his having paid restitution in full and his having successfully
6 remained under Pretrial Services' supervision for twelve months. Because
7 defendant fully complied with the terms in the Pretrial Diversion Agreement, the
8 United States moves for the Court to dismiss the Indictment against defendant,
9 consistent with the terms of the Agreement.
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12 Respectfully submitted,

13 DAYLE ELIESON
14 United States Attorney
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16 */s/ Daniel R. Schiess*

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18 Daniel R. Schiess
19 Assistant United States Attorney
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/s/ Daniel R. Schiess

Daniel R. Schiess
Assistant United States Attorney

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2 **UNITED STATES DISTRICT COURT**
3 **DISTRICT OF NEVADA**
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5 **United States of America,**
6 **Plaintiff,**

7 v.

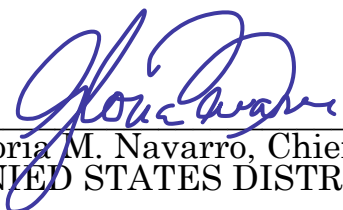
8 **Charles Wurm,**
9 **Defendant.**

Case No. 2:16-cr-00070-GMN-VCF
ORDER

10 Having duly considered the United States Motion to Dismiss the
11
12 Indictment, the motion is hereby GRANTED.

13 IT IS HEREBY ORDERED.

14 Dated this 10 day of December, 2018.

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18 Gloria M. Navarro, Chief Judge
19 UNITED STATES DISTRICT COURT
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